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8 *Attorneys for Plaintiffs*
9 Anabel Austin, et al.

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case No.: 2:24-CV-06966

DEMAND FOR JURY TRIAL

ANABEL AUSTIN, an individual; ADAM
BAILEY, an individual; MONINA BAILEY,
an individual; LARISA BARLAN, an
individual; LAURO BARLAN, an individual;
PATRICIA BARRIENTOS, an individual;
ELIJAH BECERRA, an individual; IZALIAH
BECERRA, an individual; JOSIAH
BECERRA, an individual; KARLA
BECERRA, an individual; RICHARD
BECERRA, an individual; MARCUS
BEVERLY, an individual; MASAYO
BEVERLY, an individual; MATAEUS
BEVERLY, an individual; SEVEN
BEVERLY, an individual; GINA
CERRITENO, an individual; FELICIA
DEWEY, an individual; MARK DEWEY, an
individual; BRENTON EARLEY, an
individual; BRIANNA EARLEY, an
individual; CASSANDRA EARLEY, an
individual; ENRIQUE FLORES, an
individual; DAVID GAETA, an individual;
FRANCO GAETA-MONDRAGON, an
individual; MATHIAS GAETA-
MONDRAGON, an individual; CONNIE
GARCIA, an individual; DALE GARCIA, an
individual; MICHAEL GERONIMO, an
individual; NICHOLAS GOERTEMILLE, an
individual; DASIA GOLDEN, an individual;
MIRIAM GORETTY MONDRAGON, an
individual; ERIKA HARVEY, an individual;
MIGUEL LEPE, an individual; MEREDITH
MCGOWAN, an individual; SCOTT D.
MCGOWAN, an individual; YOLANDA MC
HENRY, an individual; RICARDA
NAVARRETE, an individual; ADA
NOBRIGA, an individual; CODY PERNA, an

individual; ROBY PERNA, an individual;
AARON EDUARDO RAMIREZ, an
individual; JOSE RAMIREZ, an individual;
KEVIN RAMOS, an individual; GERALEINE
REYES, an individual; ARMANDO
RODRIGUEZ, an individual; DIEGO
RODRIGUEZ, an individual; OMAR
RODRIGUEZ, an individual; RODRIGO
RODRIGUEZ, an individual; TERESA
RODRIGUEZ, an individual; ALEXA
RUELAS, an individual; LEONARDO
RUELAS, an individual; MARILYN
SALOVICH, an individual; ASIS SANCHEZ,
an individual; LOVELLE SANCHEZ, an
individual; LARON SCARBROUGH, an
individual; BIJAN TAGHILOU, an individual;
CRISTINA TAGHILOU, an individual;
FRANK TAGHILOU, an individual;
KAYVAN TAGHILOU, an individual;
KEISHA TAYLOR, an individual; WALTER
TAYLOR, an individual; DOMINIC
TEOXON, an individual; ROGER TEOXON,
an individual; ADAM TYSON, an individual;
ANNA TYSON, an individual; HUDSON
TYSON, an individual; LISA TYSON, an
individual; NATHAN TYSON, an individual;
MICAIAH TYSON, an individual; ZOE
TYSON, an individual; ARACELI
VALENCIA, an individual; LIBRADA
VALENCIA, an individual; VAMDI
VERTUDES, an individual; ALEXANDER
VILLAFUERTE, an individual; DAVID
VOLPE, an individual; LINDA VOLPE, an
individual;

Plaintiffs,

vs.

CHIQUITA CANYON, LLC, a Delaware
Limited Liability Company; WASTE
CONNECTIONS OF CALIFORNIA, a
California Corporation; CHIQUITA
CANYON, INC., a Delaware Corporation;
WASTE CONNECTIONS US. INC., a
Delaware Corporation; and DOES 1-150,
inclusive,

Defendants.

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1 Pursuant to Federal Rule of Civil Procedure 38, Plaintiffs ANABEL AUSTIN, an
2 individual; ADAM BAILEY, an individual; MONINA BAILEY, an individual; LARISA
3 BARLAN, an individual; LAURO BARLAN, an individual; PATRICIA BARRIENTOS,
4 an individual; ELIJAH BECERRA, an individual; IZAAH BECERRA, an individual;
5 JOSIAH BECERRA, an individual; KARLA BECERRA, an individual; RICHARD
6 BECERRA, an individual; MARCUS BEVERLY, an individual; MASAYO BEVERLY,
7 an individual; MATAEUS BEVERLY, an individual; SEVEN BEVERLY, an individual;
8 GINA CERRITENO, an individual; FELICIA DEWEY, an individual; MARK DEWEY,
9 an individual; BRENTON EARLEY, an individual; BRIANNA EARLEY, an individual;
10 CASSANDRA EARLEY, an individual; ENRIQUE FLORES, an individual; DAVID
11 GAETA, an individual; FRANCO GAETA-MONDRAGON, an individual; MATHIAS
12 GAETA-MONDRAGON, an individual; CONNIE GARCIA, an individual; DALE
13 GARCIA, an individual; MICHAEL GERONIMO, an individual; NICHOLAS
14 GOERTEMILLE, an individual; DASIA GOLDEN, an individual; MIRIAM GORETTY
15 MONDRAGON, an individual; ERIKA HARVEY, an individual; MIGUEL LEPE, an
16 individual; MEREDITH MCGOWAN, an individual; SCOTT D. MCGOWAN, an
17 individual; YOLANDA MC HENRY, an individual; RICARDA NAVARRETE, an
18 individual; ADA NOBRIGA, an individual; CODY PERNA, an individual; ROBY
19 PERNA, an individual; AARON EDUARDO RAMIREZ, an individual; JOSE RAMIREZ,
20 an individual; KEVIN RAMOS, an individual; GERALEINE REYES, an individual;
21 ARMANDO RODRIGUEZ, an individual; DIEGO RODRIGUEZ, an individual; OMAR
22 RODRIGUEZ, an individual; RODRIGO RODRIGUEZ, an individual; TERESA
23 RODRIGUEZ, an individual; ALEXA RUELAS, an individual; LEONARDO RUELAS,
24 an individual; MARILYN SALOVICH, an individual; ASIS SANCHEZ, an individual;
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1 LOVELLE SANCHEZ, an individual; LARON SCARBROUGH, an individual; BIJAN
2 TAGHILOU, an individual; CRISTINA TAGHILOU, an individual; FRANK
3 TAGHILOU, an individual; KAYVAN TAGHILOU, an individual; KEISHA TAYLOR,
4 an individual; WALTER TAYLOR, an individual; DOMINIC TEOXON, an individual;
5 ROGER TEOXON, an individual; ADAM TYSON, an individual; ANNA TYSON, an
6 individual; HUDSON TYSON, an individual; LISA TYSON, an individual; NATHAN
7 TYSON, an individual; MICAIAH TYSON, an individual; ZOE TYSON, an individual;
8 ARACELI VALENCIA, an individual; LIBRADA VALENCIA, an individual; VAMDI
9 VERTUDES, an individual; ALEXANDER VILLAFUERTE, an individual; DAVID
10 VOLPE, an individual; LINDA VOLPE, an individual (collectively "Plaintiffs") hereby
11 demand a trial by jury in the above-captioned action of all issues triable by jury.
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14 Dated: September 11, 2024

TIMOTHY D. MCGONIGLE, APC

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17 By: _____
18 TIMOTHY D. MCGONIGLE
19 Attorney for Plaintiffs
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PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the above-referenced action. My address is 1880 Century Park East, Suite 516, Los Angeles, California 90067.

On September 11, 2024, I served the foregoing document described as:

DEMAND FOR JURY TRIAL

Electronically by using the Court's ECF/CM System.

<p>Gary J. Smith (SBN 141393) gsmith@bdlaw.com Jacob P. Duginski (SBN 316091) jduginski@bdlaw.com BEVERIDGE & DIAMOND P.C. 456 Montgomery Street, Suite 1800 San Francisco, CA 94104 Telephone: (415) 262-4000</p> <p>Kaitlyn D. Shannon (SBN 296735) kshannon@bdlaw.com BEVERIDGE & DIAMOND, P.C 1900 N Street, N.W., Suite 100 Washington, DC 20036-1661 Telephone: (202) 789-6040 Facsimile: (202) 789-6190</p> <p>Paul S. Chan (SBN 183406) pchan@birdmarella.com Ariel A. Neuman (SBN 241594) aneuman@birdmarella.com Fanxi Wang (SBN 287584) fwang@birdmarella.com Shoshana E. Bannett (SBN 241977) sbannett@birdmarella.com Alec M. Cronin (SBN 333774) acronin@birdmarella.com BIRD, MARELLA, RHOW, LINCENBERG DROOKS & NESSIM, LLP 1875 Century Park East, 23rd Floor Los Angeles, California 90067-2561 Telephone: (310) 201-2100 Facsimile: (310) 201-2110</p>	<p>Attorneys for Chiquita Canyon, LLC, Waste Connections of California, Chiquita Canyon, Inc. and Waste Connections US, Inc.</p>
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1 I am readily familiar with the firm's practice of collection and processing correspondence
2 for mailing. Under that practice it would be deposited with the U.S. Postal Service on that
3 same day with postage thereon fully prepaid in the ordinary course of business. I am
4 aware that on motion of the party served, service is presumed invalid if postal
cancellation date or postage meter date is more than one day after date of deposit for
mailing in affidavit.

5 I declare that I am employed in the office of a member of the bar of this court at whose
6 direction the service was made. Executed on September 11, 2024, at Los Angeles,
California.

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9 By: 
10 TIMOTHY D. McGONIGLE
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